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By ECF

Honorable Lewis A. Kaplan
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Grant Berman, et al.*
S2 03 Cr. 308 (LAK)

Dear Judge Kaplan:

We write on behalf of our client, Grant Berman, who is currently on bail in connection with the above-captioned matter, to request permission for Mr. Berman to make several single-day trips to Mexico for a two-week period, beginning October 17, 2014, for business purposes. The Court granted our previous two requests to allow Mr. Berman to travel in April and May of this year, during which time he traveled without incident. Although Mr. Berman has attempted to limit the need for him to travel outside the United States, his company has obtained a new client who wishes to meet with him in Mexico and inspect a plant there.

As we noted in our prior letters, Mr. Berman has been on bail in this matter since 2003. He resides in San Diego, California, and is an owner of a manufacturing business with a factory only a few miles over the border in Mexico. Because of the plant's close proximity to the border, Mr. Berman will return to the United States every day and will not spend a night in Mexico.

We have communicated with Assistant U.S. Attorney Alexander Wilson and with pretrial services regarding this request, and they have both provided their consent to the request. Accordingly, we respectfully request Your Honor's permission for Mr. Berman to travel outside of the country for several single-day trips to Mexico from October 17, 2014, until October 31, 2014.

Respectfully submitted,

/s/ *Daniel S. Ruzumna*

Daniel S. Ruzumna

cc: AUSA Alexander Wilson